

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Fowler Specialty Packaging, Inc.
407 South Adeway Road
Fowler, Indiana 47944**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T007-7645-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 30, 1998
First Significant Permit Modification: 007-9795	Pages Affected: 5, 6, 29, 38a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper and allied products printing operation.

Responsible Official: Richard L. Happ
Source Address: 407 South Adeway Road, Fowler, Indiana 47944
Mailing Address: P. O. Box 692, Fowler, Indiana 47944
SIC Code: 2671
County Location: Benton
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S₅ and S₈);
- (2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S₂ and S₃);
- (3) One (1) flexographic printing press, identified as press No. 4, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of thirty-one (31) inches, exhausting to two (2) stacks (S₂ and S₃);
- (4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S₄); and
- (5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of 36.0 inches; and exhausting to one (1) stack (S₁₇).
- (6) Nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; and
- (2) One (1) 5.23 million British thermal units per hour (mmBtu/hr) natural gas or fuel oil No. 2

fired boiler.

Fowler Specialty Packaging, Inc.
Fowler, Indiana
Permit Reviewer: Catherine Moore

First Significant Permit Modification: 007-9795-00010
Modified by: Holly M. Stockrahm

Page 6 of 44
OP No. T007-7645-00010

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S_5 & S_8)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Major [326 IAC 2-2]

- (a) The requirements of 326 IAC 2-2 do not apply to the one (1) rotogravure - printing press because it was constructed in 1952 which is prior to the August 7, 1977 applicability date.
- (b) Any change or modification to this facility that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

SECTION D.6

FACILITY OPERATION CONDITIONS

Nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC)

- (a) The potential volatile organic compound emissions from each of the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (b) Any change or modification to the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58 that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document for the Significant Permit Modification to the Part 70 Operating Permit

Source Name: Fowler Specialty Packaging, Inc.
Source Location: 407 South Adeway Road, Fowler, Indiana 47944
County: Benton
SIC Code: 2671
Significant Permit Modification No.: 007-9795-00010
Operation Permit No.: T007-7645-00010
Permit Reviewer: Catherine Moore/Holly M. Stockrahm

History

The Part 70 Operating Permit was issued on March 30, 1998. On May 19, 1998, Fowler Specialty Packaging, Inc. filed an Amendment requesting certain changes to the permit. The Amendment requested the following:

- (a) The one (1) rotogravure printing press has not previously been subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations). The applicability of this rule has been re-evaluated.
- (b) Some equipment has been added to the source since the submittal of the Part 70 application. The following equipment should be added to the permit:
 - (1) Nine (9) flexographic tail printers, constructed from October 1996 to March 1997, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.

Enforcement Issue

IDEM is aware that the nine (9) flexographic tail printers have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

The source states that each of these tail printers during normal operating conditions have minimal VOC emissions of below the registration threshold of three (3) pounds per hour or fifteen (15) pounds per day, and therefore, should be considered exempt from air permitting requirements.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (one (1) page).

The potential emissions of VOC are greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-7-12, a Significant Permit Modification to the Part 70 Operating Permit is required.

Federal / State Rule Applicability

- (a) The nine (9) flexographic tail printers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ because they are flexographic printers not rotogravure printers.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source. Since the nine (9) flexographic tail printers were all constructed within six (6) months of each other and they have the potential to emit Volatile Organic Compound (VOC) less than forty (40) tons per year so that 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable to these facilities.
- (c) The nine (9) flexographic tail printers are not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because the potential emissions of each are less than twenty-five (25) tons per year.
- (d) After re-evaluation of 326 IAC 8-5-5 (Graphic Arts Operations), the one (1) rotogravure printing press is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because this source is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph County as described in 326 IAC 8-5-1 (Applicability of Rule).

Proposed Changes to Part 70 Operating Permit:

The following changes were agreed to and made as the First Significant Modification for this source (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, ~~using a cyclone as control~~, exhausting to two (2) stacks (S₅ and S₈);
- (2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S₂ and S₃);
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- (4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S₄); and

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 - (6) **Nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.**
- 2. Condition D.1.2 "Volatile Organic Compounds" has been deleted from the permit because 326 IAC 8-5-5 (Graphic Arts Operations) is not applicable to this facility.
 - 3. Condition D.2.2 "Volatile Organic Compounds" has been deleted from the permit because 326 IAC 8-5-5 (Graphic Arts Operations) is not applicable to this facility.
 - 4. Section D.6 "FACILITY OPERATION CONDITIONS" has been added to the permit as follows for the nine (9) flexographic tail printers:

SECTION D.6 FACILITY OPERATION CONDITIONS

Nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC)

- (a) The potential volatile organic compound emissions from each of the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (b) Any change or modification to the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58 that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

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 - 4. Section D.6 "FACILITY OPERATION CONDITIONS" has been added to the permit as follows for the nine (9) flexographic tail printers:

SECTION D.6 FACILITY OPERATION CONDITIONS

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Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC)

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Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or

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Fowler, Indiana
Permit Reviewer: Catherine Moore

First Significant Permit Modification: 007-9795
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Page 4 of 4
OP No. T007-7645-00010

modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Page 1 of 1 TSD App A

Company Name: Fowler Specialty Packaging, Inc.
Address City IN Zip: 407 South Adeway Road, Fowler, Indiana 47944
MMT: MMT007-9795-00010
Pit ID: 007-00010
Reviewer: Holly M. Stockrahm
Date: August 19, 1998

THROUGHPUT							
Press I.D.	MAXIMUM LINE SPEED FEET MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YEAR
Tuber Machine No. 50	250	12	28	60	8760	1000000	44150
Tuber Machine No. 51	250	12	28	60	8760	1000000	44150
Tuber Machine No. 52	250	12	28	60	8760	1000000	44150
Tuber Machine No. 53	250	12	28	60	8760	1000000	44150
Tuber Machine No. 54	250	12	28	60	8760	1000000	44150
Tuber Machine No. 55	250	12	28	60	8760	1000000	44150
Tuber Machine No. 56	250	12	28	60	8760	1000000	44150
Tuber Machine No. 57	250	12	28	60	8760	1000000	44150
Tuber Machine No. 58	250	12	28	60	8760	1000000	44150

INK VOCs						
Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99
TBW/26223 Roto Water	2.78	7%	100.00%	44150	2000	3.99

Total VOC	35.90	Ton/yr
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*VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED

FLASH OFF OF 80%. OTHER TYPE OF PRINTERS HAVE A FLASH OFF OF 100%